RECEIVED FEDERAL ELECTION COMMISSION

# BEFORE THE FEDERAL ELECTIONS COMMISSION II PH 1: 56

DONALD MARK GARRINGER	)	COUNSEL
Plainfield, Indiana 46168	)	
Complainant	<b>)</b>	
And	)	
STEVEN BUYER and STEPHANIE MATTIX 200 North Main Street	)	MUR# 626/
Monticello, IN 47960 Respondents	) )	

## **YERIFIED COMPLAINT**

Comes now the Complainant DONALD MARK GARRINGER ("Garringer") to state under the penalties of perjury:

- Garringer is a resident of the State of Indiana, and resident in Indiana's Fourth Congressional District.
- 2. By information and belief from documentary material referenced in this complaint, Respondent STEVEN BUYER ("Buyer") is the Congressman of Indiana's Fourth Congressional District.
- 3. By information and belief from documentary material referenced in this complaint, Buyer is the Leadership PAC Sponsor of the Storm Chasers PAC. Respondent Stephanie Mattix ("Mattix") is the Treasurer of the Storm Chasers PAC ("Storm Chasers").

See, FEC forms on Storm Chasers at:

http://herndon1.sdrdc.com/cgi-bin/fecimg/?C00380477

- 4. The PAC address of Storm Chasers is listed on the Web in a number of places as: Storm Chasers PAC Stephanie Mattix, 200 North Main Street, Monticello, IN 47960, telephone (574) 583-9843. This is the campaign headquarters of Buyer as Congressman of Indiana's Fourth Congressional District.
- 5. By information and belief from documentary material referenced in this complaint, in 2003, Buyer created the Frontier Foundation in 2003 for the stated purposed of handing out scholarships to needy graduating high school students of Indiana's Fourth Congressional District once the fund reached \$100,000. The Frontier Foundation has raised more than \$880,000 primarily from companies and trade organizations with an interest in the House Energy and Commerce Committee, on which Buyer serves.

See, The Indianapolis Star, January 25, 2010, reported at:

http://www.indystar.com/apps/pbcs.dll/article?AID=2010100125021, which is attached to this Complaint;

You can find the IRS PDFs on the Frontier Foundation at

http://necsdataweb.urban.org/PubApps/showVals.php?ft=bmf&cin=134254757;

The Frontier Foundation forms filed with the State of Indiana are at:

https://secure.in.gov/sos/bus\_service/online\_corps/corp\_orders/select\_order\_type.aspx;

And See, The Indianapolis Star, October 20, 2009, reported at:

http://pqasb.pqarchiver.com/indystar/access/1883402091.html?FMT=ABS&date=Oct+20%2C+2009

- 6. By information and belief from documentary material referenced in this complaint, the Frontier Foundation failed to operate for its stated public purpose of helping needy students and does little more than pay for Congressman Buyer to play golf with donors with interests before his committee. Id.
- 7. By information and belief from documentary material referenced in this complaint, the business address of the Frontier Foundation is 200 North Main Street, Monticello, IN 47960, telephone (574) 583-9843, the same as the campaign headquarters of Buyer and the Storm Chasers PAC. Id.
- 8. By information and belief from documentary material referenced in this complaint and documents filed with the Internal Revenue Service, the Frontier Foundation paid part of the rent on the campaign office and used the same address and telephone number as the Storm Chasers PAC. Id.
- 9. By information and belief from documentary material referenced in this complaint and documents filed with the Internal Revenue Service, Stephanic Mattix was the PAC director and employee for Buyer's Storm Chaser PAC as well as the Secretary and employee of the Frontier Foundation. Mattix was employed by Buyer's Campaign Committee to Re-elect Buyer. Mattix claimed on the IRS forms to have worked 20hrs/week (1000 hrs per year) for the Frontier Foundation up until July 31, 2009. During this time, Mattix worked part time for the Campaign Committee. When compensation for Mattix's employment for the Frontier Foundation was discontinued on July 31, 2009, her compensation for employment by the Campaign Committee went from \$873 per month to \$1.574 per month. See, Expenditure Detail of the Campaign Committee reported at:

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http://www.opensecrets.org/politicians/expendetail.php?cid=N00003924&cycle=2010&name=Stephanie%20Mattix

- 10. By information and belief from documentary material referenced in this complaint and documents filed with the Internal Revenue Service, the Storm Chasers PAC, the Frontier Foundation, and the Campaign Committee of Buyer commingled their affairs and activity with each other, and, with the political campaigns of Buyer as Congressman of Indiana's Fourth Congressional District.
- 11. By information and belief from documentary material referenced in this complaint and documents filed with the Internal Revenue Service, the stated purposes of the Storm Chasers PAC and the Frontier Foundation were a fraud and sham, and the true purpose of these organizations was to promote the political campaigns of Buyer as Congressman of Indiana's Fourth Congressional District, and, to support his lifestyle.
- 12. By information and belief from documentary material referenced in this complaint and documents filed with the Internal Revenue Service, the employment by the Frontier Foundation of Stephanie Mattix, as referenced in paragraph nine of this Complaint, was "ghost employment" to the extent that any services rendered by Mattix to the Frontier Foundation, if any, were in the furtherance of the political campaigns and ambitions of Buyer as Congressman of Indiana's Fourth Congressional District.

I, Donald Mark Garringer,	swear the foregois	ng under penalty	of perjury.
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DONALD MARK GARRINGER	William
Plainfield. Indiana 46168	Donald Mark Garriager
telepho <u>ne:</u> e-mail:	

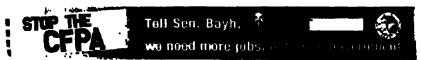
# **NOTARIZATION**

Came before me, a Notary Public for the State of Indians, the person DONALD MARK GARRINGER to swear under oath the foregoing complaint under the penalty of perjury and execute the same in my presence.

Notally Public

County of Residence: Hendricks

My Seal expires: 11, 13, 2016



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Service and the Office of Congressional Philes to review a private scholarship melation created by Rep. Store Buyer, R. Monticolle, that has not distributed any acholembias

Citizens for Responsibility and Stries—in Washington said it vants the IRS to investigate valether the foundation violated federal tex law by "falling to operate for its stated public purpose of helping mostly students and by doing little more than puping for the congrussmen to play gelf with donors with interests before his computer."

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The group wents the Office of ional Ethics to review er Buyur violated ethics subs ibusing a clearity for private case and by trading legislative tence for donations to the Ty about checky and a job for his son."

Bayor exected the Frontier foundation in 2003 for the stated purposed of handing out scholarships onto the family from \$200,000. The foundation has raised more than \$200,000 — primarily from

companies and trade organizations with an interest in the House Energy and Commerce Committee , on which Buyer anves.

The foundation hasely generated any exhaustings, which Hoper has said to because the foundation inter-decided it mental at least its million to be said esstabling. The foundation has paid for foundation golf outlage at leastly locates.

"It is not quite stealing from explane, but it is bard to imagine constiting more colless than playing golf on the backs of poor students, at least one of viscon surely could have gone to college on the money Frentier speed on Rep. Dayor's golf trips," and CROW executive diseases Melanio Slous. g more

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Administration the authority to regulate tobacco.

Pharmaceutical Research and Manufacturess of America , the drug industry

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